

STEVEN A. GIBSON
Nevada Bar No. 6656
sgibson@gibsonlegrand.com

GIBSON LEGRAND LLP
7495 West Azure Drive, Suite 233
Las Vegas, Nevada 89130
Telephone 702.541.7888
Facsimile 702.541.7899

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BEST ODDS CORP., a Nevada corporation,

Plaintiff,

v.

IBUS MEDIA LIMITED, a foreign company;
IBUS MEDIA HOLDINGS (IOM) LIMITED, a
foreign company,

Defendants.

Case No.: 2:14-cv-00932-RCJ-VCF

**PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION FOR LEAVE
TO FILE CERTIFICATE OF
INTERESTED PARTIES FOR IN
CAMERA REVIEW ONLY**

Plaintiff Best Odds Corp. ("Best Odds" or "Plaintiff"), by and through its counsel, GIBSON LEGRAND LLP, hereby oppose Defendants iBus Media Limited's and iBus Media Holdings (IOM) Limited's (collectively, "Defendants") Motion for Leave to file Certificate of Interested Parties for in Camera Review Only ("Defendants' Motion"; Doc. No. 12).

This Opposition is based on the following Memorandum of Points and Authorities, on the pleadings and papers on file herein, on any oral argument of counsel to be adduced at hearing, and on any other matter of which this Court wishes to take into consideration.

MEMORANDUM OF POINTS AND AUTHORITIES

Previously, Magistrate Judge Ferenbach admonished, in part, Defendants for their *ad hominem* attacks. Defendants did not get the message.

Plaintiff will take the high road.

There is simply ***no basis*** for Defendants' attacks alleging baseless lawsuits being filed. Plaintiff, in taking the high road, reserves further comment.

While Plaintiff appreciates the previous ultimate¹ decision by Magistrate Judge Ferenbach to allow for a non-public disclosure because of apparent non-prejudice to Plaintiff, Plaintiff respectfully seeks reevaluation of that decision in the present circumstances given the alleged facts now before the Court demonstrating the truly substantial and invasive commercial presence of Defendants in and throughout both Nevada and the United States. Defendants should not be afforded any immunity or special treatment given their tremendous commercial presence and solicitation of customers, employees and commercial relationships in Nevada and the United States.

There is also simply no basis for deciding in Defendants' favor under FRCP 26(c) because there is no annoyance, embarrassment, oppression or undue burden or expense associated with a disclosure of interested parties. This is a disclosure everyone must make.

The only basis for non-disclosure would be the generous exercise of the discretionary power of this Court to maintain proceedings before it as it reasonably desires. Plaintiff would respectfully urge that this Court is setting a dangerous precedent by favoring these particular defendants and allowing them to hide merely because there might not be prejudice to the Plaintiff. The prejudice, simply put, will be to the whole of the judicial system in not fostering judicial transparency.

¹ Magistrate Judge Ferenbach initially ruled in Plaintiff's favor, but reconsidered that ruling when making his ultimate decision.

1 **I. CONCLUSION**

2 For the reasons set forth herein, Plaintiff respectfully requests that this Court deny
3 Defendants' Motion.

4 Respectfully submitted this 10th day of October, 2014.

5 GIBSON LEGRAND LLP

6 By /s/ Steven A. Gibson

7 STEVEN A. GIBSON
8 Nevada Bar No. 6656
9 7495 West Azure Drive, Suite 233
10 Las Vegas, Nevada 89130
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CERTIFICATE OF SERVICE

Pursuant to Local Rule 5 of this Court, I certify that I am an employee of GIBSON
LEGRAND LLP and that on this 10th day of October, 2014, I caused a correct copy of the
foregoing **PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO
FILE CERTIFICATE OF INTERESTED PARTIES FOR IN CAMERA REVIEW ONLY**
to be served via CM/ECF to:

Greg Brower, Esq.
gbrower@swlaw.com
Craig S. Denney, Esq.
[cdenny@swlaw.com](mailto:cdenney@swlaw.com)
Carrie L. Parker, Esq.
cparker@swlaw.com
SNELL & WILMER L.L.P.
50 West Liberty Street, Suite 510
Reno, Nevada 89501
Telephone: (775) 785-5440
Facsimile: (775) 785-5441

/s/ Raisha Y. Gibson

An employee of GIBSON LEGRAND LLP